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REDACTED FOR  
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

vs.

1. Maurice Brooks,  
2. Micah Lazaro,  
3. Anthony Smith,  
Defendants.

No. | CR-24-2079-PHX-SPL (MTM)

**INDICTMENT**

VIO: 18 U.S.C. § 371  
(Conspiracy)  
Count 1

18 U.S.C. §§ 2113(a) and 2  
(Bank Robbery, Aid and Abet)  
Count 2

18 U.S.C. §§ 924(d) and 981,  
21 U.S.C. §§ 853 and 881; and  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

**COUNT 1**

Between on or about October 29, 2024, and November 5, 2024, in the District of Arizona and elsewhere, Defendants MAURICE BROOKS, MICAH LAZARO, ANTHONY SMITH, and others known and unknown to the Grand Jury, did knowingly and intentionally agree, combine, and conspire to commit the offense of Bank Robbery, in violation of Title 18, United States Code, Section 2113(a).

**The Means and Method of the Conspiracy**

The means and method employed by Defendants MAURICE BROOKS, MICAH

1 LAZARO, ANTHONY SMITH, and co-conspirators to carry out the conspiracy and  
2 effect its unlawful objects are as follows:

- 3 a. Since at least July 2022, Defendants and others known and unknown to the Grand  
4 Jury have committed bank robbery of Automated Teller Machine (ATM)  
5 technicians in Arizona and elsewhere. Defendants and coconspirators employ a  
6 similar modus operandi each time and either surveil and follow ATM technicians to  
7 an ATM or cause a malfunction with the ATM causing the technicians to respond.
- 8 b. At least two conspirators arrive at each ATM in a vehicle that is typically rented.  
9 When an ATM technician arrives at the ATM to perform service, Defendants and  
10 coconspirators wait for the technician to open the ATM. Then, through force,  
11 violence, and intimidation, Defendants and coconspirators steal cash cassettes from  
12 the open ATM and the technician's immediate presence.
- 13 c. Defendants and coconspirators use various means to conceal vehicle identities,  
14 including using fictitious temporary license plates, license plates for other vehicles,  
15 stolen license plates, rental vehicles, and covering vehicle identification numbers.
- 16 d. Defendants and coconspirators wear gloves, masks, and other clothing to hide their  
17 faces and identities.

18 **Overt Acts**

19 In furtherance of the conspiracy, and to effect the object of the conspiracy,  
20 Defendants and coconspirators committed, or caused to be committed, the following overt  
21 acts, among others, described below:

- 22 a. On or about October 29, 2024, a coconspirator rented a gray 2025 Toyota Camry  
23 bearing Texas temporary license plate 6338L14. The vehicle was equipped with an  
24 operable dash camera.
- 25 b. On or between November 4, 2024, and November 5, 2024, Defendants MAURICE  
26 BROOKS, MICAH LAZARO, and ANTHONY SMITH drove the rented gray 2025  
27 Toyota Camry from Texas to Arizona.
- 28 c. On November 5, 2024, at approximately 6:37 a.m., Defendant MAURICE

1 BROOKS purchased a screwdriver at Home Depot located at 12434 N. Cave Creek  
2 Road in Phoenix, Arizona.

3 d. On November 5, 2024, just before 7 a.m., Defendants MAURICE BROOKS,  
4 MICAH LAZARO, and ANTHONY SMITH stole consular license plate CJB0388  
5 from a vehicle located at 1944 W. Thunderbird Road in Phoenix, Arizona. This  
6 location is less than five miles from the Home Depot where Defendant MAURICE  
7 BROOKS purchased the screwdriver.

8 e. On November 5, 2024, at approximately 8:51 a.m., Defendants MAURICE  
9 BROOKS, MICAH LAZARO, and ANTHONY SMITH arrived at Bank of  
10 America located at 906 E. Baseline Road, Tempe, Arizona in the gray 2025 Toyota  
11 Camry.

12 f. At approximately 8:53 a.m., Defendants MAURICE BROOKS, MICAH LAZARO,  
13 and ANTHONY SMITH pulled up to the first ATM and the driver, who was  
14 wearing black and neon gloves, inserted a card covered in glue or other sticky  
15 substance into the ATM to cause a malfunction.

16 g. At approximately 9:02 a.m., Defendants MAURICE BROOKS, MICAH LAZARO,  
17 and ANTHONY SMITH pulled up to a second ATM and the driver inserted a card  
18 covered in glue or other sticky substance into the machine to cause a malfunction.

19 h. At 10:14 a.m., while two ATM service technicians were working on the  
20 malfunctioning machine, Defendants MAURICE BROOKS, MICAH LAZARO,  
21 and ANTHONY SMITH pulled up next to the technicians.

22 i. Defendants MICAH LAZARO and ANTHONY SMITH exited the gray 2025  
23 Toyota Camry wearing dark clothing, facial coverings or masks, and gloves while  
24 Defendant MAURICE BROOKS waited in the vehicle as the driver.

25 j. Defendants MICAH LAZARO and ANTHONY SMITH intimidated the  
26 technicians, causing them to move, before stealing six cash cassettes totaling  
27 \$278,000 from the open ATM.

28 k. Defendants MAURICE BROOKS, MICAH LAZARO, and ANTHONY SMITH

1 then fled the scene in the gray 2025 Toyota Camry, arriving at an apartment complex  
2 located at 4690 S. Lakeshore Drive, Tempe, Arizona approximately eight minutes  
3 later.

4 1. Defendants MAURICE BROOKS, MICAH LAZARO, and ANTHONY SMITH  
5 emptied the cash cassettes into one or more backpacks and discarded the cassettes,  
6 consular license plate, and one glove into a nearby dumpster at 4690 S. Lakeshore  
7 Drive.

8 m. Defendants MAURICE BROOKS, MICAH LAZARO, and ANTHONY SMITH  
9 parked the gray 2025 Toyota Camry in a parking spot at 4690 S. Lakeshore Drive  
10 before leaving the location.

11 All in violation of Title 18, United States Code, Section 371.

12 **COUNT 2**

13 On or about November 5, 2024, in the District of Arizona, Defendants MAURICE  
14 BROOKS, MICAH LAZARO, and ANTHONY SMITH by force, violence, and  
15 intimidation, did take from the person and presence of an ATM technician, money  
16 belonging to and in the care, custody, control, management, and possession of Bank of  
17 America, located at 906 E. Baseline Road, Tempe, Arizona, the deposits of which were  
18 then federally insured by the Federal Deposit Insurance Corporation (FDIC).

19 All in violation of Title 18, United States Code, Sections 2113(a) and 2.

20 **FORFEITURE ALLEGATION**

21 The Grand Jury realleges and incorporates the allegations of Counts 1 and 2 of this  
22 Indictment, which are incorporated by reference as though fully set forth herein.

23 Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C.  
24 § 2461(c), and upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment,  
25 Defendants shall forfeit to the United States of America all right, title, and interest in (a)  
26 any property constituting, or derived from, any proceeds the persons obtained, directly or  
27 indirectly, as the result of the offense, and (b) any of the Defendants' property used, or  
28 intended to be used, in any manner or part, to commit, or to facilitate the commission of,

1 such offense as to which property the Defendants are liable, including, but not limited to,  
2 any property involved and used in the offense.

3 If any forfeitable property, as a result of any act or omission of the Defendants:

4 (1) cannot be located upon the exercise of due diligence,

5 (2) has been transferred or sold to, or deposited with, a third party,

6 (3) has been placed beyond the jurisdiction of the court,

7 (4) has been substantially diminished in value, or

8 (5) has been commingled with other property which cannot be divided without  
9 difficulty,

10 it is the intent of the United States to seek forfeiture of any other property of said  
11 Defendants up to the value of the above-described forfeitable property, pursuant to 21  
12 U.S.C. § 853(p).

13 All in accordance with 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, 28  
14 U.S.C. § 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

15  
16 A TRUE BILL

17  
18 s/  
19 FOREPERSON OF THE GRAND JURY  
20 Date: December 18, 2024

21 GARY M. RESTAINO  
22 United States Attorney  
23 District of Arizona

24 s/  
25 PATRICK E. CHAPMAN  
26 Assistant U.S. Attorney  
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